



Providing Safe and Effective Pest
Management Solutions for
Specialty Crop Growers

IR-4 Headquarters
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Ms. Barbara Madden
EPA-OPP Document Processing (REGFEE)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 S. Crystal Drive
Arlington, VA 22202

Dear Barbara:

RE: Imidacloprid
Admire® 2 Flowable Insecticide, EPA Registration No. 264-758
Gaucho® 550 SC Insecticide, EPA Registration No. 264-827
Provado® 1.6 Flowable Insecticide, EPA Registration No. 264-763
Provado® 70 WG Insecticide, EPA Reg. No. 264-823
Gaucho® 480 Flowable Insecticide, EPA Registration No. 264-957
Gaucho® 600 SC Insecticide, EPA Registration No. 264-828
Gaucho® 600 F Insecticide, EPA Registration No. 264-968
1-[(6-Chloro-3-pyridinyl) methyl]-N-2-imidazolidinimine, and its metabolites
containing the 6-chloropyridinyl moiety, all expressed as 1-[(6-chloro-3-
pyridinyl)methyl]-N-nitro-2-imidazolidinimine
New Use
Peanut, Proso Millet, Pearl Millet, Oat, Kava
IR-4 Final Report on Peanut
Field trials, 12; analytical reports, 1; peanut processing report, 1
FEE CATEGORY: R-17
REGISTRATION FEE: \$250,000 (See IR-4 Waiver Request below)

The undersigned, Dr. Keith Dorschner, Senior Coordinator, Interregional Research Project No. 4, State Agricultural Experiment Station, Rutgers, The State University of New Jersey, Princeton, New Jersey 08540, on behalf of the IR-4 Project and the Agricultural Experiment Stations of TX, MO, GA, WI, and HI submits this petition pursuant to Section 408(e) of the Federal Food, Drug and Cosmetic Act, as amended, with respect to the pesticide chemical, Imidacloprid (40 CFR 180.472).

List of Studies Submitted in Support of Proposed Tolerance for Imidacloprid:

Vol. No	Volume Title
46952901 2	Imidacloprid: Magnitude of the Residue on Peanut

Major funding for IR-4 is provided by Special Research Grants and Hatch Act Funds from USDA-CSREES,
in cooperation with the State Agricultural Experiment Stations, and USDA-ARS.



As per the "IR-4 Waiver Determination Under the Pesticide Registration Improvement Act" signed by OPP Director James J. Jones, the IR-4 tolerance petition for Imidacloprid in or on Peanut, Proso Millet, Pearl Millet, Oat, and Kava is in the public interest. Therefore, IR-4, along with registrant Bayer Corp., is requesting a waiver of the registration services fee for the imidacloprid on peanut, proso millet, pearl millet, oat, and kava petition.

IR-4 also submits the following in support of the proposed tolerances for imidacloprid:

- 1) EPA forms 8570-1 and 8570-31
- 2) Draft labels (shaded and not shaded)
- 3) Data Matrices
- 4) Notice of Filing

Yours very truly,

Interregional Research Project No. 4

Petitioner

Per 

Keith Dorschner, Ph.D.
Entomology Manager
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CC: Mel Tolliver (transmittal letter, Volume 1 and Volume 2)
RFC (transmittal letter, petition)

